

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

WILLIAM HANSON, III,

Plaintiff,

v.

LOWE'S HOME CENTERS, INC., et al.

Defendants.

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C.A. No.: 05-0046 (JJF)

TRIAL BY JURY DEMANDED

NOTICE OF DEPOSITION

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PLEASE TAKE NOTICE that the deposition of the Defendant Corporation, DDP Holdings, Inc. ("DDP"), pursuant to Federal Civil Rule of Procedure 30(b)(6) will be taken at 1:00 p.m. on Monday August 1, 2005 at the offices of Schmittinger and Rodriguez, P.A., 414 South State Street, Dover, DE 19901. Defendant Corporation shall produce one or more persons who consent to testify on behalf of Defendant DDP as to all matters known or reasonably available to Defendant DDP regarding the content of each of the following items, which said items shall be brought to the deposition(s) for questioning of the deponent(s):

1. Any and all communications, including correspondence, internal memoranda and e-mails, between or among Defendants, any other party, or any of Defendants' agents regarding Plaintiff;
2. Any and all employment files, personnel files, or other records relating to the employment of Plaintiff by Defendant DDP, including any and all evaluations,

whether formal or informal, and disciplinary actions of Plaintiff;

3. Any and all payroll records regarding or concerning Plaintiff, including records of wages and/or salary, records of benefits, and records of taxes or other amounts withheld by Defendant DDP;
4. Documentation relating to the Job Description of Plaintiff;
5. Documents relating to Plaintiff's job duties and responsibilities and the performance thereof;
6. Documents relating to Defendant DDP's employment policies;
7. Documents relating to Defendant DDP's relationship to Defendant Lowe's;
8. Any documentation of workplace conduct, rules or regulations that Defendant DDP contends applies to Plaintiff;
9. Any other documentation relating to workplace conduct, rules or regulations for employees and others conducting business with Defendant Lowe's on Defendant Lowe's premises.

SCHMITTINGER AND RODRIGUEZ, P.A.

BY:


William D. Fletcher, Jr.

Bar ID #362

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Attorneys for Plaintiffs

Dated: 7/25/05
WDF:tcl

cc: Cheryl Anthony